

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZION ALEXANDER,

Plaintiff,

-against-

THE CITY OF NEW YORK, et al.,

Defendants.

1:25-CV-284 (RA)

ORDER

RONNIE ABRAMS, United States District Judge:

Plaintiff Zion Alexander, who is currently held in the Otis Bantum Correctional Center on Rikers Island, filed this action *pro se*, asserting claims of federal constitutional violations under 42 U.S.C. § 1983, and seeking damages and injunctive relief. By letter dated April 4, 2025, Plaintiff requested that he be provided with his original Complaint, requested an extension of time to file an amended complaint, and moved for appointment of *pro bono* counsel.

Plaintiff's request to be provided with this original Complaint is granted. The Complaint is attached to this Order.

Because Plaintiff's amended complaint is not due until thirty days after he receives the full names and addresses of the John Doe Defendants, Plaintiff's request for an extension is denied without prejudice. If Plaintiff needs an extension after receiving the full names of Defendants, he may file a new request for an extension at that time.

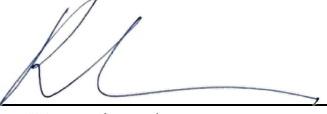
Plaintiff's request for appointment of *pro bono* counsel is also denied without prejudice to renewal. In considering whether to appoint *pro bono* counsel, the Court considers the "merits of the case, the plaintiff's efforts to obtain a lawyer, and the plaintiff's ability to gather the facts and present the case if unassisted by counsel." *McBride v. C&C Apartment Mgmt.*, No. 21-CV-2989 (RA), 2021 WL 2077818, at *1 (S.D.N.Y. May 24, 2021). Of these, the merits is the "factor which

command[s] the most attention.” *Cooper v. A. Sargent Co.*, 877 F.2d 170, 172 (2d Cir. 1989). “Because it is too early in the proceedings for the Court to assess the merits of this action, the Court denies Plaintiff’s application for the Court to request *pro bono* counsel without prejudice to Plaintiff’s filing another such application at a later date.” *McBride*, 2021 WL 2077818, at *1.

The Clerk of Court is respectfully directed to mail a copy of this Order and the attached Complaint to Plaintiff.

SO ORDERED.

Dated: April 14, 2025
New York, New York



Ronnie Abrams
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKZION ALEXANDER

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

The City of New York... etcNYC Health & Hospitals / Correctional Health Services
(Bellevue Hospital)Jhon doe (psy. D) #1Jhon doe (psy. D) #2C.O Dejesus

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name ZION Alexander
 ID # 4412303517
 Current Institution GRVC
 Address 09 - 09 HAZEN Street, East Elmhurst, Queens, NY
11370

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name The City of New York Shield # _____
 Where Currently Employed _____
 Address _____

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ DEC 20 2024 ★

BROOKLYN OFFICE
COMPLAINTunder the
Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint)Jury Trial: Yes No
(check one)

— CV —

Defendant No. 2

Name Bellevue Hospital Shield # _____
 Where Currently Employed 462 1st Ave
 Address New York 10016 / 55 Waters Street
18th Pl, NY, NY, 10041

Defendant No. 3

Name [Psy. D] Jhon Doe #1 Shield # _____
 Where Currently Employed New York, 462 1st Ave
 Address 10016 (Bellevue Hospital) CPAP (Psychiatric)
unit

Defendant No. 4

Name [Psy. D] Jhon Doe #2 Shield # _____
 Where Currently Employed CPAP (Psychiatric) unit
 Address 462 1st Ave, 10016
Bellevue Hospital

Defendant No. 5

Name DEJESUS DE JESUS Shield # N/A
 Where Currently Employed _____
 Address 09-09 Hazen street, East Elmhurst
11370, Queens

II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?

GRVC / Bellevue Hospital, Rikers Island, GRVC,
13A, Mtn Clinic

B. Where in the institution did the events giving rise to your claim(s) occur?

Bellevue Hospital, CPAP / CPAS, Psych unit GRVC -
Rikers Island

C. What date and approximate time did the events giving rise to your claim(s) occur?

On 11/27/2024 Between 2:00 pm to 10 pm

D. Facts: Please SEE Attached paper work.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

PLEASE SEE ATTACHED paper work

III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Several violations of Constitution Rights Such

As Eighth, fourth and 18th Amendments. Several cuts on left arm, Stomach Ulcers flare ups from ingesting several pills. Acute damage to kidneys, loss of memory from fainting, Trauma from almost fatal Events.

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes No

1 OF 10

* Attached paper work

11/28/2024

On or About, In the Hospital on 11/27/2024
Approx: (4pm-9pm) "2 Jhon doe psych doctors, Intentionally and
deliberately Deprived me, of poor mental Health Attention of
Admittance, By Going Against All Evidence of plaintiffs
Emergency Suicidal Attempt Here on Rikers Island, where plaintiff
Successfully Swallowed 10-15 pills In direct observation [A Technical
Overdose] "while on suicide watch here on rikes Island due
To Failed Adequate supervision and intervention of plaintiff on
Correction officers end, which led me to be rushed to
Bellevue hospital on 11/27/2024 Around 2pm under
(CSN # 1644873) and MRN # (382855) The Jhon doe #¹
Psych doctor, Short Fair skin Complexion and Jhon doe #² psych doctor
Tall dark Complexion Glasses short hair, possibly from a different Ethnic
Background (Please Request records for I was Not Allowed the doctors
names*) Asseseted me Briefly without, writing notes and
readily Cutting off plaintiff several times while plaintiff Attempted
to prove the reason why he wants to be Admitted. The 2 doctors
refused to Listen and Consider plaintiff side of events, The 2 doctors
shortly Concluded to Immediately Send/Return plaintiff Back
To rikers Island (Currently An unsafe Environment) were Plaintiff
overdose Arose from. Eventhough plaintiff Continued to Express
NOT feeling safe Confused and Currently experiencing ~~the~~ Suicidal
Ideations to the point, If plaintiff were to return
To rikes He would plan his Next Suicidal Attempt,
In Efforts to be successful this time.

2 OF 10

The undemanded determination of events, should have contributed to plaintiffs Admittance to Bellevue forward. The 2 psych doctors also failed to Notify and Explain the decision behind their denial of Admittance.

These events deprives plaintiff's of Constitutional Rights by denying me to proper adequate treatment and civil right to NOT BE discriminated against. Deprived of life, when Both these doc doctors knew to an extent where I seriously injured myself under Custody's care and observation, which allowed plaintiff to digest 10-15 pill I A suicide attempt under Plaintiff Grief to losing his mother. Its safe to conclude that plaintiff may NOT be safe in the care of Rikers Island, since plaintiff, continuously causing serious harm to himself, that could lead to death, AN serious Intervention is needed, which is why plaintiff was transferred to Bellevue in the first place. But the discriminatory against plaintiff observation caused by illegal Biased Ability to communicate effectively which made the doctors believe he doesn't need mental health care, which is unduly unfair under the circumstances of plaintiff's actions that occurred and still occurs and serious wishes to end ones life. Its contradictory to determine to send the plaintiff who overdosed in a serious attempt to kill himself, back to the setting that contributed and allowed this attempt and behavior to happen in the first place. Its more than likely an conspiracy where plaintiff faces in custody where D.O.C and doctors act under the presumption that inmates/prisoners constantly

3 of 10

deliberately fabricate symptoms to achieve to be hospitalized because their theory believes that hospitals are better than jails.

The Conspiracy The then do doctors relayed on, If plaintiff had his "liberty" his outcome undoubtly would of been different, "mental health care" is not an optional essentail, It's an essential right, no one should have to go/plead under hardship or drastic scenarios for rights that are given, when one may need or warrant mental health help, one should not be deprived, simply because of an opinion against rigious facts. This is common for believe to constantly over look it's patients (plaintiff) for reasons that may never be revealed, "hints". Abuse of discretion simply because plaintiff asked for help, they simply denied it.

Even though A psch may wield total power of discretion that doesn't give the doctor the right to abuse it by picking and choosing who needs to be admitted simply by the appearance of patient / plaintiff. Plaintiff (Zion Alexander) also argues due to "Extreme Emotional Distress, several suicide attempts (recorded on record of HIPPA) even while on 1 to 1 watch due to a separate, earlier suicidal attempt, plus Rikers poor efforts to keep "plaintiff" safe, He expressed 4/3 undue willingness (voluntary) wishes to accept to "go up stairs and participate in his recovery" for he desperately depends on the doctors help. plaintiff continues to constantly argue

4 of 10

H3 regards To Commit suicide IF He was to Return to Rikes Island - The deprivation effected Plaintiff by overlooking obvious signs and Inadvertly placing Plaintiff In Harms way By sending him to Rikes, the previous place that allowed and Continue to allow MR ZION Alexander to Commit suicide while In Custody. Also failing To supervise Plaintiff and properly screen him, AS A proper procedure by psch doctors. For example Consider the doctors, "poor Efforts" to Review MR-ZION's Entire charts And clear wishes to stay at Bellevue because rightnow he cannot control H3 urges, Also consider the John doe doctor #1, who completely disregarded the Plaintiff's wishes By walking out mid-conversation lacking Any deep concern to listen for the safety of MR. Alexander. Again, Effecting Mr Alexander's Rights, By unusual procedures, and Intententional deprivation off MR ZION's (Const. Rights).

This Is not proper protocol for a patient who has A history of suicidal Attempts, This Is 2 psch doctors who Illegally Judged him Because/ Plaintiff Is In D.O.C Custody A pretrial detainee, who they believe should NOT have Any rights to Appropriate/ medical / mental Health care (simply because one Is In Custody) / (deprived liberty) In a attempt to forcefully keep MR ZION In a unsafe Unsupervised setting knowingly Against Violating MR. ZION's Const. Rights.

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1

RIKERS

Intentional Deliberate Indifferent, Denied of fair and Adequate medical care^{psych.} while In Custody of States City's Jail.

Intentionally Medically Negligent towards plaintiffs who IS Currently undergoing symptoms of AN Active suicidal Attempt of Ingesting ≈ 20 - 30 pills [OVER Dose].

Several times plaintiff Attempted to End's one life and then be denied proper and Adequate medical and psych. Care while In the Care and custody of Rikers Island.

On December 06th 2024

plaintiff's watch officer, Jackson and witness Correctional officer Thompson (Both Badge # unknown) At or Around The Hours of 7:45pm - 9pm, Plaintiff, Inside jail ERVC, unit 13A In the dayroom right Next to the pantry, on Camera Told officer, "Thompson" I Need help for the Voices are telling me to kill myself then proceeded to Ingest 15 - 20 pill In front of Both (Listed Above) officers while officers Said to plaintiff ("we dont care go ahead AND Take and Swallow em, kill your self") Plaintiff Asked For Procurement to be taken to Clinic to be observed and Card For. The Two officers refused to Contact, transfer or Report plaintiffs Injuries and well being to Any doctor or professional

b of 10

Proving the Negligence and Intentional Indifference towards plaintiff, who clearly needed help at the time and should of have, had the chance to see a medical doctor. Note plaintiff never were to this day produced in front of any doctor.

12/02-04/2024 ≈ 6:00pm - 7:pm

Another date: ~~[REDACTED]~~

Plaintiff was called for "DoT" at the mini clinic inside of jail ERVC (Next to 11 A/B unit) Again plaintiff on camera inside of mini clinic appeared in front of Doctor or medical provider (Believes his name is "ADAM") Plaintiff swallowed 15-20 pills, cut his left arm with glass and drunk rubbing alcohol in a raging mental episode, where he intended to end one's life. Officer (Dejusesus his watch officer at the time intervened and took the bottle out of plaintiff's hands in an attempt to prevent anymore harm) Doctor "ADAM" Alleges to he will not help or contact help or doctors despite plaintiff unhealthy actions, in a deliberate attempt to harm plaintiff's rights and livelyhood as a human being, therefore an grave indifference for a medical professional to not assist or intervene or help a person, where in this case the plaintiff (ZION, ALEXANDER). These actions must exclude from personal and zealous intentions that goes against policy and somehow still allowed plaintiff to engrave them. Please initiate a investigation for I passed out during events and my memory is effected.

1 of 10

Rikers Shall Be Held liable for their Actions of their Employee's (Correction officers) For failing To prevent their Employees Neglectful and Indifferent Actions towards Plaintiff, Because If Rikers Had A Stricter or ZERO tolerance for Such behavior A Neglectful Action Intended towards A (P.I.C) [person In custody] (Plaintiff In this case) Could have been Avoided altogether. Its Almost As If the Correction officers Could violate any rule or Constitutional Rights of (P.I.C'S) AND Bear No Liability at any cost at all.

Rikers Island has A duty to render and give All Necessary medical treatment to those In Custody for Plaintiff Is Not At liberty, for Rikes Island to NOT bear AN Enforceful policy / remedy to AID those who Are ^{In} extreme danger to one's self Is A Grate Indifference In It's self.

B of D

The Supervision of Rikers Island Is
deemed unsafe FOR the Plaintiff, who IS currently
suicidal and vigorously still attempting suicide. FOR
example Correction officers Are not allowed to
Administer medication or intervene in with a
person In custody lacking immediate violent behavior
towards Another, due to thes Rikes may fail again
to keep Mr. Alexander safe from him self for It's
policy and their other failed attempt that are recorded
In the past.

In the event of MR. Alexander safety
the psych doctors Should have the burden of liability
for allowing the plaintiff to kill himself back at
Rikes and failing to supervise him In a appropriate
setting regardless of current observation, but due to His
extensive history and Rikes poor supervision His life
and safety should not be taken lightly Their for plaintiff
deeply denies any opinion or ruling that the 2 psych doctors
may have concluded.

9 OF 10

Every defendant listed acted in accordance
 to color of the state law; for the purposes of
 Deliberately, deliberately, violating Plaintiff's 8th and 14th
 Amendments, By not taking the injuries of plaintiff
 seriously: Depriving him (plaintiff of life and liberty)
 Right to Adequate medical care
 By the 2 psych doctors knowingly and negligently
 sending (plaintiff) back to Rikers Island, the same
 place where plaintiff under surveillance, almost
 committed suicide, and currently still trying to end
 his life by self's and other serious harm. Where
 psych doctors have a duty to make sure that
 patients have a safe "discharge" / disposition" to
 go to. Its more than clear to determine "Rikes"
 is not currently safe or adequate for (plaintiff). But
 the 2 doctors (psych) still continued to discharge him
 even though they knew it was a high probability to send
 him back ("completely unusual") for a licensed doctor
 to send patient back to environment that's unstable and
 safe for plaintiff's serious attempts to end ones life.

The doctors of Rikers and Bellevue constantly goes against
 "protocol and proper procedure", by observing the patient to
 the extent that they rely on the appearance of
 plaintiff and not the words OR Actions plaintiff may
 presenting which is "non" reasonable for doctors to do
 especially if plaintiff had his liberty and was
 able to attend a clinic or ~~a~~ a emergency room

10 of 10

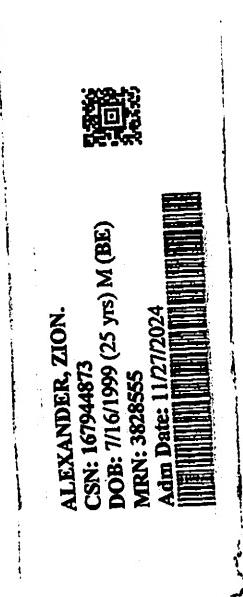
liberty

If Plaintiff Had His liberty, The outcome would
of been In the safety of Plaintiff's life. Plaintiff's
"Equal protection" Rights were also a direct violation of that
FOR Rikers did not want to seek A Hospitalization
of Plaintiff that would of and could of prevented
His later Attempts and prevented any Injuries from
Occurring.

I ASK to weight these accusations against
The Turner Test to see If Incarcerated
Individuals Should have Involuntary and voluntary Admissions
To Psych hospitals? FOR I may have avoided any attempt
and damages IF I could of Exercised my right's and
Voluntarily admitted myself for proper care.

As the behavior of defendants were "Deliberate Indifference"
were they (psych) doctors known or should have known
that their is a substantial risk of harm that sending
me back to "riker's" would violate my Constitutional rights and
they also fail to fix or remedy those harms-

Exhibit "A"



← Proof of my admissions
At Bellevue Hospital
And CASE # To lookup
And Investigate.

I Ask the court to
Initiate A Investigation
to find out who the defendant
Are hopefully "Exhibit" "A", will
Help!

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Bellevue Hospital /D.o.c Unit.

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes _____ No _____ Do Not Know

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes _____ No _____ Do Not Know

If YES, which claim(s)? _____

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes _____ No

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes _____ No

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

1. Which claim(s) in this complaint did you grieve? _____

2. What was the result, if any? _____

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. _____

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: _____
Not Sure If It Covers Hospital's

2. If you did not file a grievance but informed any officials of your claim, state who you informed,

when and how, and their response, if any: _____

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. _____

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). Plaintiff seeks \$2,000,000 for

Compensation of Injuries and Violation of Civil / Const Rights and or
The defendant / license Removal of doctors Involved or Any other right
for defendants To Free. where plaintiff Freedom / Liberty Is
restraint , The Custodian / Custody Supervisor Bears All liability
to make Sure Custodian Recives Adequate mental / physical health
treatment , EVEN Self Inflicted Injuries.

VI. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ____ No 1

On
these
claims

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes _____ No _____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?)

On
other
claims

- C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?

Yes No _____

- D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff ZION Alexander

Defendants NEW York City and corporate Counsel et...

2. Court (if federal court, name the district; if state court, name the county) _____
NORTHERN & SOUTHERN

3. Docket or Index number 1:24-CV-8084 / 1:24-CV-8083

4. Name of Judge assigned to your case UNSURE AT MOMENT

5. Approximate date of filing lawsuit ≈ 10/25/2024

6. Is the case still pending? Yes No _____

If NO, give the approximate date of disposition N/A

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) Pending

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 28th day of November, 2024.

Signature of Plaintiff

Inmate Number

Institution Address


441 23 03517
09-09 Hazen street
Queens New York 11370

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 11th day of December, 2024, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:



FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

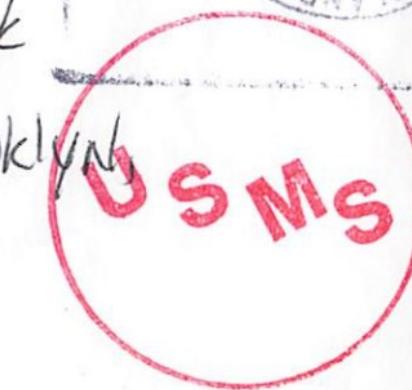
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IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ DEC 20 2024 ★ UNITED States District Court
BROOKLYN OFFICE

★ DEC 20 2024 ★ EASTERN District of New York

BROOKLYN OFFICE 225 Cadmen Plaza East, Brooklyn
New York, 11201

ATTN: PRO SE OFFICE



The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS		DEFENDANTS
Zion Alexander 4412303517 GRVC 09-09 Hazen Street, East Elmhurst, Queens NY 11370		The City of New York; NYC Health & Hospitals/ Correctional Health Service (Bellevue Hospital); Jhon Doe(psych. D) #1; Jhon Doe(psych. D) #2; C.O. Dejesus
(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>		County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i>
(c) Attorneys (Firm Name, Address, and Telephone Number) Pro Se Plaintiff (see above)		Attorneys (If Known) Gujarati, J. Marutollo, M.J.

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)		III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)			
<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i>	Citizen of This State	<input type="checkbox"/> PTF 1	<input type="checkbox"/> DEF 1	Incorporated or Principal Place of Business In This State
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i>	Citizen of Another State	<input type="checkbox"/> PTF 2	<input type="checkbox"/> DEF 2	Incorporated and Principal Place of Business In Another State
<i>Does this action include a motion for temporary restraining order or order to show cause? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></i>		Citizen or Subject of a Foreign Country	<input type="checkbox"/> PTF 3	<input type="checkbox"/> DEF 3	Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)					
CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	PROPERTY RIGHTS	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 800 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			IMMIGRATION	SOCIAL SECURITY	
			<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	
				FEDERAL TAX SUITS	
				<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party	<input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)						
<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION		Cite the U.S. Civil Statute under which you are filing (<i>Do not cite jurisdictional statutes unless diversity</i>): 42 USC § 1983			
		Brief description of cause: Civil Rights			

VII. REQUESTED IN COMPLAINT:		<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.	DEMAND \$	CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
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VIII. RELATED CASE(S) IF ANY		(See instructions):		JUDGE DG-JAM	DOCKET NUMBER 24-cv-07765-DG-JAM
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DATE	SIGNATURE OF ATTORNEY OF RECORD				
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12.20.2024

FOR OFFICE USE ONLY

RECEIPT #	AMOUNT	APPLYING IFP	JUDGE	MAG. JUDGE
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Local Arbitration Rule 83.7 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration

I, _____, counsel for _____, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

- monetary damages sought are in excess of \$150,000, exclusive of interest and costs,
- the complaint seeks injunctive relief,
- the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more or its stocks:

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that "A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 1(c)

- 1.) Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County? Yes No
- 2.) If you answered "no" above:
 - a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County? Yes No
 - b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? Yes No
 - c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received: _____

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? Yes No

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.

Yes No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?

Yes (If yes, please explain) No

I certify the accuracy of all information provided above.

Signature: _____